

**ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK P.C.**

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A. Mitchell Greene

*Attorneys for the Debtors and Debtors in
Possession*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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Hearing Date:

April 30, 2015 at 10:00 a.m.

In re:

Chapter 11

AC I INV MANAHAWKIN LLC,
AC I MANAHAWKIN MEZZ LLC, and
AC I MANAHAWKIN LLC,

Case No.: 14-22791 through
14-22793 (RDD)
(Jointly Administered)

Debtors.

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**NOTICE OF DEBTORS' MOTION FOR
ENTRY OF ORDER FURTHER EXTENDING EXCLUSIVE
RIGHT TO FILE A PLAN OF REORGANIZATION AND TO SOLICIT
ACCEPTANCES WITH RESPECT THERETO AND FOR RELATED RELIEF**

PLEASE TAKE NOTICE, that upon the annexed application of AC I Inv Manahawkin LLC ("Inv"), AC I Manahawkin Mezz LLC ("Mezz") and AC I Manahawkin LLC ("LLC", and defined together with Inv and Mezz as the "Debtors"), by their attorneys, dated January 30, 2015, a hearing (the "Hearing") will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, Southern District of New York, White Plains Division, 300 Quarropas Street, White Plains, New York 10601, on April 30, 2015 at 10:00 a.m., or as soon thereafter as counsel can be heard, for entry of an order further extending the periods for which the Debtors have the exclusive right to file a plan and solicit acceptances with respect thereto and for such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief sought in the application, must be in writing setting forth the facts and authorities upon which an objection is based, filed with the Clerk of the United States Bankruptcy Court, Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, with a copy to Chambers, provided, however, that pursuant to *general order* No. M-399 re Electronic Case Filing Procedures (as amended from time to time), entities with Internet access shall file objections (formatted in the Adobe Acrobat file format) at <http://www.nysb.uscourts.gov>, and served so as to be received by the attorneys for Debtors, Robinson Brog Leinwand Greene Genovese & Gluck P.C., 875 Third Avenue, 9th Floor, New York, New York 10022, attention: A. Mitchell Greene, Esq., and the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Room 1006, New York, New York 10004, Attention: Serene Nakano, Esq. no later than seven (7) days prior to the Hearing.

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice except by announcement of such adjournment in open court on the date scheduled for the Hearing.

DATED: New York, New York
January 30, 2015

**ROBINSON BROG LEINWAND GREENE
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By: /s/ A. Mitchell Greene
A. Mitchell Greene